

IN THE  
UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
(Alexandria Division)

TECSEC, INC.,

Plaintiff,

V.

INTERNATIONAL BUSINESS MACHINES  
CORP.,

Defendant.

Case No. 1:10-cv-115-LMB/TCB

**TECSEC'S BRIEF IN SUPPORT OF ITS MOTION TO COMPEL DAMAGES-RELATED DISCOVERY AND SOURCE CODE INFORMATION**

**FILED UNDER SEAL**

Dated: August 16, 2010

Respectfully submitted,

TECSEC, INC.

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**CERTIFICATE OF SERVICE**

I certify that on August 16, 2010, TecSec's Motion to Compel Damages-Related Discovery was electronically filed with the Clerk of the Court using the CM/ECF system, and that this system will issue an electronic notification of filing to the following:

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